Idaho Department of Environmental Quality
AQUACULTURE FACILITY INSPECTION SURVEY
General NPDES Permit Numbers IDG-130000
Effective: December 1, 2007. Expiration: November 30, 2012
NOI Submission: On or by June 3, 2012 (for next permit cycle)

PURPOSE OF INSPECTION	Determination of compliance with NPDES permit and the Clean Water Act.
TYPE OF INSPECTION	□ Unannounced □Announced **XX** □CSI **XX** □CEI □Recon
DATE(s) OF PREVIOUS NPDES INSPECTIONS	Date: **02/25/2010** Date: **05/16/2006** Date: **06/11/2003**
PENDING OR CURRENT ENFORCEMENT ACTIONS (review NOV and warning letters on file)	1. **06/23/2010 – NOV** 2. 3.
PRIMARY FACILITY NAME	**Fish Breeders of Idaho (FBI) – Smith**
OTHER NAME(S) USED FOR FACILITY	**N/A**
NPDES PERMIT #	**IDG-130090**
FACILITY CONTACT	Name: **Leo Ray** Position: **Owner** Phone Number: **208-837-6114** Fax Number: **208-837-6245** Email: **fpi@fishbreedersofidaho.com**
FACILITY SIZE (annual fish production; affects frequency of monitoring requirements in parentheses). Confirm production and monitoring frequency during the inspection.	> 500,000 (monthly) 100,000 - 500,000 (quarterly) < 100,000 (semi-annual) **XX** Other (explain)
INSPECTOR(s) AND AFFILIATION Craig Thomas	**Craig Thomas** **Regional Aquaculture Coordinator** **Idaho Department of Environmental Quality** **Twin Falls Regional Office**
DATE OF INSPECTION	Date: **08/03/2015** On-site paperwork review: Arrival Time: **15:00 PM** Departure Time: **16:10 PM** On-site physical inspection: Arrival Time: **10:20 AM** Departure Time: **10:55 PM**
Photo of facility sign, if any, and facility	**N/A**
DATE OF FINAL REPORT	Date: **09/28/2015**

ENTRY AND PERMIT CONDITIONS REVIEW

X Present your credentials and provide a business card.

OPENING CONFERENCE	
1. Explain the purpose of the inspection and how the inspection will proceed.	Remarks: **Mr. Ray acknowledged the purpose of the inspection and procedures.**
2. Review the issuance and expiration dates of the facility's NPDES permit.	Remarks: **Mr. Ray acknowledged the issuance and expiration dates of the NPDES permit.**
3. [I.C.3.c.] Explain the NOI and the date of submission prior to the expiration date of the permit (June 3, 2012 – 180 days prior to expiration).	Remarks: **Explanation of the NOI and submission deadlines were read to and understood by Mr. Ray.**
4. Explain that the inspection will involve a review of DMRs, QA Plan, BMP Plan, the most recent NOI, Receiving Water Monitoring Report & the Annual Report.	Remarks: **Mr. Ray acknowledged he understood that the inspection will involve a review of DMRs, QA Plan, BMP Plan, the most recent NOI, Receiving Water Monitoring Report & the Annual Report.**
5. Explain that the inspection will involve a site tour/visit of the facility.	Remarks: **Mr. Ray acknowledged that a site inspection would be part of the inspection process.**
6. Are all necessary personnel present for the inspection?	Remarks: **Mr. Ray stated that all necessary personnel were present for the inspection.**
7. Will any chemicals or hazardous chemicals be encountered during the site tour/visit?	Remarks: **Mr. Ray stated that no chemicals or hazardous chemicals would be encountered during the site tour/visit.**
8. Does the permittee have any questions before proceeding with the inspection?	Remarks: **Mr. Ray had no questions before proceeding with the inspection.**
PRELIMINARY QUESTIONS	
1. Obtain representative's name, position, and phone number.	Name: **Leo Ray** Position: **Owner** Phone: **208-837-6114** Email: **FPI@fishbreedersofidaho.com**
2. How long has the representative worked for the company?	**Mr. Ray stated he had worked and owned FBI since 1968.**
3. How long has he/she held the position?	**Mr. Ray stated he has held the position of owner since 1968.**
4. Other representative(s) present for the inspection.	Name: **Starla Barnes** Position: **Production Manager** Phone: **208-837-6114** Email: **FPI@fishbreedersofidaho.com**
NOTICE OF INTENT (NOI)	
NOI Review**:** Show the interviewee the NOI, and ask him/her to review it for errors. If errors are found, ask him/her to correct the errors and initial the corrections. A new NOI should be submitted if several corrections are made.	
1. What is the date of the most recently submitted NOI?	**February 28, 2012**
2. Is the NOI complete and current?	**Yes – Mr. Ray stated that the NOI is complete and current.** No

3. Have any structural changes been made to the facility recently?	Yes **No – Mr. Ray stated that no structural changes have been made recently.**
4. Any structural changes anticipated? (Plan and Spec review required of IDEQ, if so; see page 47; Part VI.I.2.)	Yes **No – Mr. Ray stated that no structural changes are planned.**
FACILITY LOCATION, ETC. (see NOI)	Address: N **42.88385469** **W -114.9183553** Phone: **208-837-6114** Fax: **208-837-6245** Email: **FPI@fishbreedersofidaho.com**
OWNER NAME	**Leo Ray**
OWNER ADDRESS	Address: **P.O. Box 479** **Hagerman, ID. 83332** Phone Number: **208-837-6114** Fax: **208-837-6245** E-mail: **FPI@fishbreedersofidaho.com**
OPERATOR NAME	**Big Bend Trout Inc.**
OPERATOR ADDRESS	Address: **P.O. Box 479** **Hagerman, ID. 83332** Phone Number: **208-837-6114** Fax: **208-837-6245** E-mail: **FPI@fishbreedersofidaho.com**
PERMIT TRANSFERS 1. Is this a new operator?	Yes **No – Mr. Ray stated that no permit transfers have taken place.**
If new, review the following: According to VII. I. "Transfers. Authorization to discharge under this permit may be automatically transferred to a new permittee on the date specified in the agreement only if: 1. The current permittee notifies the Director of the Office of Water and Watersheds at least 30 days in advance of the proposed transfer date; 2. The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility and liability between them; and 3. The Director does not notify the existing permittee and the new permittees of its intent to revoke and reissue the authorization to discharge.	
2. Was EPA and IDEQ notified in writing of the transfer?	Yes No **N/A**
LOCATION OF FACILITY Previous GPS: Latitude: **42˚ 53.036** Longitude: **114˚ 55.185** Date: 2/**25/2010** Time: **None stated**	GPS taken at entrance to facility: Latitude: N **42.88385469** Longitude: **W -114.9183553** Date: **8/3/2015** Time: **10:54**
	Google Earth GPS at entrance to facility: Latitude: **N 42.667661** Longitude: **W -114.816046** Elevation: **2805 feet** Date: **09/08/2013**

AUTHORIZATION TO DISCHARGE	
1. Did you receive a letter authorizing you to discharge?	**Yes – Mr. Ray provided a letter from EPA to FBI – Smith Farm dated November 5, 2007** No
2. "Addressee" on the authorization to discharge letter: 3. Is this correct?	Name: **Leo Ray** **FBI – Smith Farm** **Yes – The address and name appears to be correct.** No: name_____
4. Do you have a copy of the permit?	**Yes – Mr. Ray stated he had a copy of the permit and provided a copy.** No
5. Is the facility currently discharging? 6. Was the facility containing, growing or holding fish on December 1, 2007 (effective date of the permit)? 7. If not currently discharging, when do you expect to rear fish again at this facility?	**Yes – Mr. Ray stated that the facility is discharging.** No **Yes –Mr. Ray stated that the facility was containing, growing or holding fish on December 1, 2007.** No **N/A** Date:
8. [II.A.1. & 2. (p 10)]Do you plan to participate in Pollutant Trading?	**Yes – Mr. Ray indicated that Pollutant Trading could be a future option.** No
(We will add more questions later once pollutant trading starts to happen.)	
PROHIBITED DISCHARGES	
Part II.B., Page 29. Review the prohibited discharges 1 & 2 (a-h) with the interviewee. **COMPLETED**	
1. Have you had any such prohibited discharges that you know of since December 1, 2007?	Yes No – **Mr. Ray stated that he was not aware of any prohibited discharges since December 1, 2007.**
2. Do you expect to have any difficulty prohibiting such discharges from this facility?	Yes **No – Mr. Ray stated that he would not have any difficulty prohibiting such discharges from this facility.**
Questions or Comments:	**Mr. Ray had no questions or comments at that time.**
PROHIBITED PRACTICES	
Part II.C., Pages 29-30. Review the prohibited practices 1 - 2 with the interviewee. **COMPLETE**	
1. Have you or any other employee engaged in any of these prohibited practices that you know of since December 1, 2007?	Yes **No – Mr. Ray stated that he or any other employee had not engaged in any of these prohibited practices that you know of since December 1, 2007.**

2. Do you expect to have any difficulty prohibiting such practices at this facility?	Yes **No – Mr. Ray stated that he did not expect to have any difficulty prohibiting such practices at this facility.**
Questions or Comments:	**Mr. Ray had no questions or comments at that time.**
DMR - FACILITY MONITORING REQUIREMENTS	
Part II.D., (see page 30-33). Ask to see the recent DMRs and raw data. Review to determine if the permittee is filling in the correct data (influent, effluent raw data, and effluent net). See page 30, II.D.2.b., for requirement when data are less than MDL. According to II. D., "The permittee shall monitor discharges from all outfalls authorized under the permit as specified in Tables 12 and 13…" (see pages 30-33) For frequency requirements, see footnote 16 of Table 12, and footnote 29 of Table 13 for OLSBs)	
1. When was the last monitoring event?	**Mr. Ray stated that the last monitoring event took place July 31, 2015.**
2. Who conducted the monitoring?	**Mr. Ray stated that he or Mrs. Barnes conducts the monitoring.**
3. Is this the person who usually conducts the monitoring?	**Yes – Mr. Ray or Mrs. Barnes regularly conduct monitoring activities.** No
4. Who fills out the DMRs?	**Mr. Ray stated that he fills out the DMRs.**
5. When was the most recent DMR submitted to EPA and IDEQ?	**Mr. Ray stated that the last submitted DMR was mailed before Aug. 2, 2015. IDEQ office received July 2015 DMR on Aug. 5, 2015.**
6. [II.D.1.] Do you monitor discharges from all outfalls authorized under this permit as specified in Table 12 (p 31) (Raceways and FFSBs) and Table 13 (p 32) (OLSBs)?	**Yes – Mr. Ray stated that all discharges are monitored from all outfalls.** No
7. [II.D.2.a.] Do you use methods that can achieve MDLs less than or equal to those specified in Table 15 (p 34)?	**Yes – Mr. Ray stated that methods are used to achieve MDLs less than or equal to those specified in Table 15 (p 34).** No
8. [II.D.2.b.] For purposes of reporting on the DMR, do you comply with Appendix D, 4?	**Yes – Mr. Ray stated that reporting on DMRs comply with Appendix D, 4.** No
9. Influent Water Sources	
a. How many influent sources?	**Mr. Ray stated that one coldwater spring source named Decker Spring.**
b. Are all influent sources monitored for flow?	**Yes – Mr. Ray stated that all influent sources are monitored for flow.** No
c. Are all influent sources monitored for WQ parameters?	**Yes – Mr. Ray stated that all influent sources are monitored for WQ parameters.**

	No
d. Are all influent sources combined into one sample to determine flow and/or WQ parameters?	**Yes – Mr. Ray stated that all influent sources are composite samples to determine flows and/or WQ parameters.** No
10. Raceways and FFSBs Discharges [II.D.3] (Table 12, p 31)	
a. [II.D.3.a.] Timing: Are all influent and effluent samples and flow measurements taken on the same day?	**Yes – Mr. Ray stated that all influent and effluent samples and flow measurements are taken the same day.** No
b. [II.D.3.b] Timing: If your facility has multiple effluent discharge points and/or influent points, do you composite samples from all points proportionally to their respective flow?	**Yes – Mr. Ray stated that a composite sample is taken from all points proportionally to their respective flow.** No
c. [II.D.e.b.] Location: Are effluent samples from the effluent stream collected just prior to discharge into the receiving waters?	**Yes – Mr. Ray stated that effluent samples are collected just prior to discharge into receiving waters.** No
d. [II.D.e.b.] Location: If the effluent stream mixes with other flows, do you collect effluent samples from the effluent stream just prior to discharge into receiving waters?	Yes **No – Mr. Ray stated that the effluent stream does not mix with other flows prior to collection of samples. Question 10 c. accurately demonstrates what occurs at the facility.**
e. [II.D.e.b.] Location: If the facility with raceways discharges to a FFSB(s), do you collect effluent samples from the FFSB(s) just prior to discharge into the receiving waters?	**Yes – Mr. Ray stated that effluent samples are collected from FFSBs just prior to discharging into receiving waters.** No
f. [II.D.3.c.] Small discharges: Does the facility have small discharges that comprise less than 1% of the total raceway flows?	Yes **No – Mr. Ray stated that the facility does not have small discharges that comprise less than 1% of the total raceway flows.**
g. [II.D.3.c.] Small discharges: Are the flows of these small discharges monitored at a minimum of once per year?	Yes No **N/A**
h. [Table 12, p 31, Footnote 17] What is the interval of discrete sampling for the composite sample? (The permit requires four or more discrete samples taken at one-half hour intervals or greater in a 24 hour period.)	**Mr. Ray stated that at least four samples are taken at least 30 minutes apart in a 24 hour period and normally at least 2 hours apart in a 24 hour period.**
i. [Table 12, p 31, Footnote 17] When sampling raceway discharge, is at least one sample taken during quiescent zone or raceway cleaning? (“at least ¼ of the samples”)	**Yes – Mr. Ray stated that sampling included at least one sample taken during quiescent zone or raceway**

	cleaning. No
If not, why not?	**N/A**
j. [Table 12, p 32, Footnote 17] What types of samples are taken for influent? (permittees with spring influents may elect to take grabs, page 32, footnote 17)	**Mr. Ray stated that composite samples are taken for influent sampling.**
k. How and where is flow measured for the raceways? And by whom?	**Mr. Ray stated that he measures flow by using a sharp crested weirs at the top of A-raceway banks that capture the total flow thru the facility.**
l. [Table 12, p 31, Footnote 14] Is this flow measurement method one of those specified in Appendix E. Part I.A. (p 79)?	**Yes – Mr. Ray stated that flow measurements are one of the methods specified in Appendix E. Part I.A. (p 79)** No
m. [Table 12, p 32, Footnote 18] Are all influent and effluent samples and flow measurements taken on the same day?	**Yes – Mr. Ray stated that all influent and effluent samples and flow measurements taken on the same day.** No
n. [Table 12, p 31, Footnote 15] Is flow measurement taken concurrently with each pollutant sampling, when applicable, once for every composite sample? Or is it taken on either the influent or effluent as long as the measurement at that location accurately reflects the discharge flow to the receiving water?	**Yes – Mr. Ray stated that when composite samples are taken flow measurements are taken concurrently with each pollutant sampling, when applicable, at a least once for every composite sample.** No **Yes – Mr. Ray stated that flow measurements are taken at locations that accurately reflect flows into receiving waters.** No
11. How is the flow measuring device calibrated? And by whom?	**Mr. Ray stated that flow measurements are taken and calibrated by himself and the local watermaster from IDWR**
12. OLSBs Monitoring Measurements [II.D.4.]: No OLSB	
a. [II.D.4.] Does the facility collect effluent samples from the effluent stream just prior to discharge into the receiving waters?	Yes No **N/A**
b. [Table 13, p 32, Footnote 25] Are OLSB influent and effluent samples collected during quiescent zone cleaning?	Yes No **N/A**
c. How and where is flow measured for the OLSBs? And by whom?	**N/A**
d. [Table 13, p 32, Footnote 27] Is the flow measurement one of those specified in Appendix E.I.A.?	Yes No **N/A**
e. [Table 13, p 33, Footnote 28] For OLSB effluent or	Yes

influent, are flow measurements taken concurrently with pollutant sampling, when applicable? Or is it taken on either OLSB influent or effluent as long as the measurement at that location accurately reflects the discharge flow to the receiving water?	No **N/A** Yes No **N/A**
f. [Table 13, p 33, Footnote 30] Does the facility monitor for composite samples? If so, does the composite sample represent 4 or more discrete samples taken at ½ hour intervals or greater in a 24-hour period? Do the composite samples represent multiple effluent discharge points and/or influent points as same day samples from all point proportionally to their respective flows?	Yes No **N/A** Yes No **N/A** Yes No **N/A**
g. How and where is flow measured for the OLSBs? And by whom?	**N/A**
h. How is the flow measuring device calibrated? And by whom?	**N/A**
i. [Table 12, p 31, Footnote 16] What is monitoring frequency of the OLSBs?	**N/A**
k. [Table 12, p 31, Footnote 18] Are all influent and effluent samples and flow measurements taken on the same day?	Yes No **N/A**
l. [Table 12, p 32, Footnote 20] Does the facility monitor for temperature?	Yes No **N/A**
m. [Table 12, p 32, Footnote 21] Does the facility monitor for copper?	Yes No **N/A**
13. [Table 12, p 32, Footnote 19] Was net effluent load recorded on the DMR calculated correctly? (check a few DMRs; see Appendix D, page 75 for equations)	Yes No **N/A**
14. Are you aware of any recent violations of the permit limits? What was the limit that was exceeded? Date of the exceedance.	Yes No **N/A**
15. Are the data reported properly on the DMRs?	Yes No **N/A**
16. Are DMR data consistent with analytical results?	Yes No **N/A**
RECEIVING WATER MONITORING	
Part II.E., (see pages 33-35). According to II.C.1., "All permittees with OLSB that discharge directly to receiving water must conduct receiving water monitoring for ammonia, pH, and temperature upstream from the outfall." And	

2, "All facilities using chelated copper compounds or copper sulfate must monitor total recoverable copper and hardness immediately upstream of the outfall at least once in any quarter when these compounds are applied..." Ask to see the QA Plan which will describe where the samples are taken in the receiving stream.	
1. [II.E.1.] Does the facility have an OLSB discharging to a receiving stream? If so, are you monitoring receiving water for ammonia, pH, and temperature upstream from the outfall?	Yes No **N/A** Yes No **N/A**
2. [II.E.2.] Does the facility use chelated copper compounds or copper sulfate? If so, are you monitoring receiving water for total recoverable copper and hardness immediately upstream of the outfall in any quarter?	Yes No **N/A** Yes No **N/A**
3. [II.E.3.] Are receiving water samples grab samples and are they collected during the time when effluent composite samples are being collected for the same parameters?	Yes No **N/A**
4. [II.E.4.] Are receiving water samples analyzed using EPA approved methods capable of achieving method detection limits (MDLs) that are equivalent to or less than those listed in Table 15 (Permit, p 34)?	Yes No **N/A**
5. [II.E.5.]Are you submitting the results to EPA and IDEQ with the DMRs?	Yes No **N/A**
6. [II.E.6.] Are receiving water monitoring results submitted to EPA with copies to IDEQ with the DMRs for the month when the monitoring is conducted? Does the DMR report include all information required in Part V.E. and a summary and evaluation of the analytical results, including a short discussion of the accuracy and precision of the data, any problems with sample collection or analysis that may have affected the results, or what conditions existed at the time of the sample collection that may be relevant to how representative the data may be of the normal conditions at that site?	Yes No **N/A**
7. [II.E.7.] Is quality assurance/quality control plans (QAQC plans) for all the monitoring, documented in the QA Plan required under Part II.F (Quality Assurance Plan)?	Yes No **N/A**
QUALITY ASSURANCE PLAN (QA PLAN)	
Part II.F., (see page 35). According to II.F. "The permittee must develop a QA plan for all monitoring required by this permit. The plan must be developed and implemented within 60 days of coverage under this permit."	
1. [II.F.] Do you have a QA plan?	**Yes – Mr. Ray stated that a QA plan had been developed. DEQ office received complete version of the QA plan on August 26, 2015.** No
2. [II.F.] When did you submit the certification (Appendix F)	**DEQ records show a QA certification**

that a plan has been developed and is being implemented?	**was received January 28, 2008 from Mr. Ray.**
3. [II.F.1.] Is the QA Plan designed to assist in planning for the collection and analysis of effluent and receiving water samples in support of the permit and in explaining data anomalies when they occur?	**Yes – FBI – Smith Pond QA plan appears to be designed to assist in planning for the collection and analysis of effluent and receiving water samples in support of the permit and in explaining data anomalies when they occur, Mr. Ray agreed with the statement.** No
4. [II.F.2.] During all sample collection and analysis activities, does the permittee use the EPA-approved quality assurance and quality control (QA/QC) and chain-of-custody procedures described in EPA/QA/R-5 and EPA/QA/G-5?	**Yes – Mr. Ray stated that all sample collection and analysis activities uses the EPA-approved quality assurance and quality control (QA/QC) and chain-of-custody procedures described in EPA/QA/R-5 and EPA/QA/G-5.** No
5. [II.F.2.] Is the QA Plan prepared in the format that is specified in EPA/QA/R-5 and EPA/QA/G-5?	Yes **No – Mr. Ray stated that he believed the QA plan followed the EPA guidelines. DEQ reviewed the submitted QA plan. The QA plan does not appear to have all 24 fields as required by the EPA/QA/R-5.**
6. [II.F.3.a)] Does the QA Plan include: details on the number of samples, type of sample containers, preservation of samples including temperature requirements, holding times, analytical methods, analytical detection and quantification limits for each parameter, type and number of quality assurance field samples, precision and accuracy requirements, sample preparation requirements, sample shipping methods, and laboratory data delivery requirements?	Yes **No – Mr. Ray stated that he believed the QA plan included all stated details. DEQ reviewed the submitted QA plan and it appears to be missing several details.** **Information missing or incomplete include: Type of sample containers, preservation of samples including temperature requirements, type and number of quality assurance field samples, sample shipping methods, and laboratory data delivery requirements.**
7. [II.F.3.b)] Does the QA Plan include: description of flow measuring devices or methods used to measure influent and/or effluent flow at each point, calibration procedures, and calculations used to convert to flow units. If a permittee's facility has multiple effluent discharge points and/or influent points, it must describe its method of compositing samples from all points proportionally to their respective flows?	Yes **No – Mr. Ray stated that he believed the QA plan included all stated details. DEQ reviewed the submitted QA plan and it appears to be missing several details.** **Information missing or incomplete include: Description of flow measuring devices or methods used to**

	measure influent and/or effluent flow at each point, calibration procedures, and calculations used to convert to flow units.
8. [II.F.3.b.(1)] If you elected to take grab samples of influents, does the plan provide evidence of insignificant variability among influent sources?	Yes **No – Mr. Ray stated that he believed the QA plan provided adequate information. DEQ found that the QA plan states that a composite sample is taken for influent sources and will be representative of the flow and lacks specific information about influent sampling.**
9. [II.F.3.b.(2)] If you elected to not monitor small discharges that comprise less than 1% of the total raceway flows, does the plan provide justification that effluent quality of these discharges is the same as monitored discharges?	Yes No **N/A - This facility does not have small discharges.**
8. [II.F.3.c.] Does the QA Plan include a map(s) of sampling points, including receiving water sampling locations and justification for the choice of the sampling?	**Yes – A map was included in the QA plan.** No
11. [II.F.3.c.] Does the QA Plan have a location of the small discharges that comprise less than 1% of the total raceway flows?	Yes No **N/A - This facility does not have small discharges.**
12. [II.F.4.d.] Does the QA Plan include qualifications and trainings of personnel?	Yes **No – Mr. Ray stated that the QA plan includes qualifications and trainings of personnel. DEQ found that a general description was listed if a new person takes samples; no list of specific personnel, qualifications, or trainings was included.**
13. [II.F.4.e.] Does the QA Plan include the laboratory name and telephone number?	**Yes – Mr. Ray stated that the QA plan includes laboratory name and telephone number. Confirmed by DEQ review of QA plan.** No
14. [II.F.5.] Are copies of the QA Plan kept on site and made available to EPA and IDEQ upon request? If lack of suitable storage area makes on-site storage	Yes **No – Mr. Ray stated that the QA plan is stored at head office. Although, the plan took a day to find in the old office building and over a week to be distributed to DEQ on August 26, 2015.** **Yes – Mr. Ray will be placing a copy**

impossible, is he QA Plan kept in the possession of staff whenever they are working on-site?	**of the QA plan on employees PDAs for on-site access.** No
15. Is facility following / using the QA Plan?	**Yes – Mr. Ray stated that the facility is following and using the QA plan.** No
BEST MANAGEMENT PRACTICES PLAN (BMP PLAN)	
Part III (see page 36). According to Part III.C., "the permittee must develop and implement a BMP Plan which meets the specific requirements listed in Part III.E.	
1. Do you have a BMP plan?	**Yes – Mr. Ray confirmed that the facility has a BMP plan. The BMP plan is stored at head office. Although, the plan took a day to find in the old office building and over a week to be distributed to DEQ on August 26, 2015.** No
If not on site, is it in the possession of staff when they are working on-site?	Yes **No – Mr. Ray stated that a copy was not currently on-site, but would make a copies and place it on the employees PDAs**
2. When did you submit the certification (Appendix F) that a plan has been developed?	**Yes – Mr. Ray stated that a BMP plan had been developed. DEQ office received complete version of the BMP plan on August 26, 2015.** **DEQ records show a BMP certification that was received February 28, 2008 from Mr. Ray.** **No**
3. Chemical Storage a. ensure proper storage to prevent spills,	**Yes – Mr. Ray stated that no chemicals were stored on-site. If chemicals were ever stored on-site they would be stored properly.** No
b. implement procedures for proper containing, cleaning and disposing of spilled material.	**Yes – Mr. Ray agreed and stated that proper controls are used to prevent any spills.** No
4. Structural Maintenance a. routinely inspect rearing and holding units and waste collection containment to identify and promptly repair damage, How often?	**Yes – Mr. Ray agreed and stated that the facility's rearing and holding units and waste collection containment is routinely inspected to identify and promptly repair damage on a daily basis.**

	No
b. regularly conduct maintenance of rearing and holding units and waste collection and containment systems to ensure their proper function	**Yes – Mr. Ray agreed and stated that the facility is routinely inspected and regularly conduct maintenance of rearing and holding units and waste collection and containment systems to ensure their proper function.**
	No
5. Training Requirements:	
a. Train personnel in spill prevention and clean-up and disposal of spilled materials.	**Yes – Mr. Ray agreed and stated that personnel are trained in spill prevention and clean-up and disposal of spilled materials.**
	No
b. Train personnel on proper structural inspection and maintenance of rearing and holding units and waste collection and containment systems.	**Yes – Mr. Ray agreed and stated, that personnel are trained on proper structural inspection and maintenance of rearing and holding units and waste collection and containment systems.**
	No
6. Operational Requirements:	
a. Water which is disinfected with chlorine or other chemicals must be treated before it is discharged to waters of the U.S.	**Yes – Mr. Ray agreed and stated that disinfection with chlorine or other chemicals is not used at this facility, but if they were they would be treated before discharging into waters of the U.S.**
	No
b. Treatment equipment used to control the discharge of floating, suspended or submerged matter must be cleaned and maintained at a frequency sufficient to prevent overflow or bypass of the treatment unit by floating, suspended, or submerged matter.	**Yes – Mr. Ray agreed and stated that Treatment equipment used to control the discharge of floating, suspended or submerged matter must be cleaned and maintained at a frequency sufficient to prevent overflow or bypass of the treatment unit by floating, suspended, or submerged matter on a daily basis.**
	No
c. Procedures must be implemented to prevent fish from entering quiescent zones, full-flow and off-line settling basins. Fish which have entered quiescent zones or basins must be removed as soon as practicable.	**Yes – Mr. Ray agreed and stated that procedures are implemented to prevent fish from entering quiescent zones, full-flow and off-line settling basins. Fish which have entered quiescent zones or basins must be**

	removed as soon as practicable. No
d. All drugs and pesticides must be used in accordance with applicable label directions (FIFRA or FDA)	**Yes – Mr. Ray agreed and stated that if drugs and pesticides are used, they are in accordance with applicable label directions (FIFRA or FDA)**
e. Chelated copper compounds and copper sulfate, when used, must be applied to only one raceway at a time.	**Yes – Mr. Ray agreed and stated that Chelated copper compounds and copper sulfate are not used at this facility, but if they were, they would be applied to only one raceway at a time.** No
f. Identify and implement procedures to collect, store, and dispose of wastes, such as biological wastes, in accordance with IDAPA §02.04.17 and IDAPA §58.01.02. Such wastes include fish mortalities and other processing solid wastes from aquaculture.	**Yes – Mr. Ray agreed and stated that the facility has procedures to collect, store, and dispose of wastes, such as biological wastes, in accordance with IDAPA §02.04.17 and IDAPA §58.01.02.** No
g. Implement procedures to control the release of transgenic or non-native fish or their diseases as specified in any permit(s) issued by the Idaho Department of Fish and Game for the importation, transportation, release or sale of such species, in accordance with IDAPA §13.01.10.100.	**Yes – Mr. Ray agreed and stated that the facility implements procedures to control the release of transgenic or non-native fish or their diseases as specified in any permit(s) issued by the Idaho Department of Fish and Game for the importation, transportation, release or sale of such species, in accordance with IDAPA §13.01.10.100.** No
h. Implement procedures to eliminate the release of PCBs from any known sources in the facility, including paint, caulk, or feed	**Yes – Mr. Ray agreed and stated that the facility implements procedures to eliminate the release of PCBs from any known sources in the facility, including paint, caulk, or feed.** No

When was the BMP Plan last updated?	**IDEQ received a BMP certification document on February 5, 2008. IDEQ received the BMP on August 26, 2015.**
AQUACULTURE SPECIFIC REPORTING REQUIREMENTS (Part IV., Page 38)	
A. Drug And Other Chemical Use And Reporting Requirements (see pages 38-39)	
1. Do you use drugs, pesticides or other chemicals?	Yes **No – Mr. Ray stated that the facility does not use drugs, pesticides or other chemicals.**
If yes, ask to see the Chemical Log Sheet. (see Appendix G, page 91)	
2. Are records being maintained of all applications?	Yes **No – Mr. Ray stated that no records are being maintained because no use drugs, pesticides or other chemicals.**
3. When an INAD or extra label drug is used for the first time, you are required to report this orally and in writing to EPA and IDEQ.	**Yes – Mr. Ray is aware of the requirement to report INAD and extra label drug use orally and in writing to EPA and IDEQ, but is prohibited from drug use because his buyer (Whole Foods) prohibits any use during propagation.** No
Have you used INADs or plan to use INADs or extra label drugs?	Yes **No – Mr. Ray stated that an INAD or extra label drugs would not be used at the facility.** **N/A**
If so, have you written to EPA and IDEQ that you have signed up to use an INAD or prescription? (page 88)	Yes **N/A** No
Have you provided an oral report to EPA and IDEQ of an INAD or prescription use? (page 87)	Yes **N/A** No
Have you provided a written report to EPA and IDEQ of an INAD or prescription use? (page 89)	Yes **N/A** No
B. Structural Failure (see page 39) Remind the interviewee of this new requirement: Failure or damage to the facility must be reported to EPA and IDEQ orally within 24 hours and in writing within five days when there is a resulting discharge of pollutants to waters of the U.S.	**Yes – Mr. Ray stated that he was aware of the requirement to report failure or damage to the facility to EPA and IDEQ orally within 24 hours and in writing within five days when there is a resulting discharge of pollutants to waters of the U.S.** No
C. Spills of feed, drugs, pesticides or other chemicals (see	**Yes – Mr. Ray stated that he was**

page 39) Remind the interviewee of this new requirement: The permittee must monitor and report to EPA and IDEQ any spills that result in a discharge to waters of the United States; these must be reported orally within 24 hours and in writing within five days.	**aware of the requirement to monitor and report to EPA and IDEQ any spills that result in a discharge to waters of the United States; these must be reported orally within 24 hours and in writing within five days.** No
D. Annual Report of Operations (see page 40) Remind the interviewee of this requirement: The permittee must prepare and submit an annual report of operations by January 20th of each year to EPA and IDEQ. (see Appendix H, page 95-96 for form)	**Yes – Mr. Ray stated that he was aware that the permittee must prepare and submit an annual report of operations by January 20th of each year to EPA and IDEQ.** No
1. Did you submit the last report as required?	**Yes – Mr. Ray stated that he submitted the last annual report. This was confirmed by IDEQ, an annual report for 2014 was received on January 15, 2015.** No
2. Is the annual report complete? (Check the report against the required elements on pages 95-96.)	Yes **No – DEQ checked the 2014 Annual Report. Section VI was incomplete. No maps were attached for land application of solids and/or irrigation with wastewater; and top of first page did not clearly state which year the annual report was for, the space was left blank.**
Ask to see the annual logs of production. 3. Are the logs consistent with what is reported in the annual report?	**Yes - DEQ checked the production logs and they are consistent with the annual reports.** No
4. Was the facility able to provide all the required paper documentation requested?	**Yes – Mr. Ray was able to provide all required paper documentation.** No
FACILITY PHYSICAL INSPECTION	
Objectives of the facility inspection include: identifying all discharges to the surface waters from the facility; observing and recording prohibited discharges or practices; and noting any problems. Many of these questions are subjective.	
1. Any excessive feed in the raceways?	Yes **No – Excessive feed was not found in the raceways at the time of the on-site physical inspection.**
2. Any excessive solids stirred up in raceways?	Yes **No – Excessive solids were not found in the raceways at the time of the on-site physical inspection.**
3. Are all the barrier dam boards in place and level?	**Yes – All barrier and dam boards appeared to be in place and level at**

	the time of the on-site physical inspection. No
4. Any excessive solids built up in quiescent zones?	Yes **No – Excessive solids were not found in the quiescent zones at the time of the on-site physical inspection.**
5. Any excessive solids going over the dam boards.	Yes **No – Excessive solids were not observed going over the dam boards at the time of the on-site physical inspection.**
6. Any fish observed in the quiescent zones?	Yes **No – Fish were not observed in the quiescent zones at the time of the on-site physical inspection.**
Photo(s) of raceway(s) conditions above: Waypoints 232-234	
DISCHARGES	
Photo(s) of raceway(s), tailrace, and/or full-flow settling basin discharges. Waypoints 232-240	
Are there any unreported outfalls? (check observed against NOI)	Yes **No-unreported outfalls were not identified during the physical inspection.**
If so, describe: **N/A**	
Photo (s) of receiving water(s), particularly documenting any of below: Waypoints 237	
1. Any floating solids or visible foam in other than trace amounts?	Yes **No – Floating solids or visible foam in other than trace amounts were not observed at the time of the inspection.**
2. Any evidence of discharged sludge, grit or accumulated solid residues?	Yes **No – Evidence of discharged sludge, grit or accumulated solid residues were not observed.**
3. Any floating or suspended or submerged matter, including dead fish, in amounts causing nuisance or objectionable condition?	Yes **No – Floating or suspended or submerged matter, including dead fish, in amounts causing nuisance or objectionable conditions were not observed.**
4. Location of the receiving water monitoring.	**At waypoint 236**
5. If the facility has an **OLSB(s)**, is it discharging?	Yes **No – The facility does not have an OLSB.**

Photo(s) of OLSB discharges: N/A	
RECEIVING WATERS	
Photo(s) of receiving water(s), particularly documenting any of the items below: Waypoints 237	
1. Any floating solids or visible foam in other than trace amounts?	Yes **No – Evidence of floating solids or visible foam was seen at the time of the inspection.**
2. Any evidence of discharged sludge, grit or accumulated solid residues?	Yes **No - Evidence of discharged sludge, grit or accumulated solid residues was not seen at the time of the inspection.**
3. Any floating or suspended or submerged matter, including dead fish, in amounts causing nuisance or objectionable condition?	Yes **No- Evidence of floating or suspended or submerged matter, including dead fish, in amounts causing nuisance or objectionable conditions.**
FLOW MEASUREMENT DEVICE(S)	
1. Were flow measurements taken during inspection?	Yes **No – Flow measurements were taken during the inspection. Flow was recorded earlier in the day as 7.7 cfs.**
Photo(s) of taking flow measurement: **N/A**	
2. Location of flow measuring device for raceways:	**Over sharp crested weirs at top of A-raceway banks to measure total water flow.** Other _____
3. How are flow measurements taken?	**By using a ruler to measure depth of water over weirs.** Other weir _____ Other _____
4. Location of flow measuring device for OLSBs:	**N/A**
SAMPLING LOCATION & SAMPLING PREPARATION	
1. Are influent sample locations adequate?	**Yes – Mr. Ray described them as adequate, which was visually verified during on-site inspection.** No
2. Are effluent sample locations adequate?	**Yes – Mr. Ray described them as adequate, which was visually verified during on-site inspection.** No
3. Are samples refrigerated / iced down after sampling?	**Yes – Mr. Ray stated that samples are iced and refrigerated.** No

4. Are samples iced down during transportation to contract Lab?	**Yes – Mr. Ray stated that samples are iced and refrigerated during transportation to the contract laboratory.** No
SOLIDS CONTAINMENT & STORAGE	
1. Is the solids disposal area adequate?	**Yes – Mr. Ray described them as adequate.** No
2. Removed solids prevented from reentry to navigable waters?	**Yes – Mr. Ray stated that all solids are trucked to agricultural lands away from the facility.** No
3. Does the facility land apply solids or irrigate with or apply wastewater?	**Yes – Mr. Ray stated that all solids are land applied to agricultural lands away from the facility.** No
INSPECTION CONCLUSION DATA SHEET (ICDS) INFORMATION	
1. Did you observe deficiencies (potential violations) during the on-site inspection?	Yes **No – deficiencies (potential violations) were not seen during this inspection.**
2. If so, did you communicate them to the facility during the inspection?	Yes **N/A** No
3. Did the facility or operator take any corrective actions	Yes **N/A** No
4. Did you provide general compliance assistance during the inspections?	Yes **No – general assistance was not provided during the inspection.**
5. Did you provide site-specific compliance assistance?	Yes **No – site specific assistance was not provided during the inspection.**
AREAS OF CONCERN	
1. **DEQ reviewed the submitted QA plan and it appears to be missing several details. Information missing or incomplete include: Type of sample containers, preservation of samples including temperature requirements, type and number of quality assurance field samples, sample shipping methods, and laboratory data delivery requirements.**	
2. **Additional missing or incomplete information includes: Description of flow measuring devices or methods used to measure influent and/or effluent flow at each point, calibration procedures, and calculations used to convert to flow units.**	
3. **Copies of BMP and QA plans were not currently on-site, but Mr. Ray stated he would make copies and place it on the employees PDAs.**	
4. **Annual Reports are not properly labeled specifying exact year on header.**	
Other: N/A	

Exhibit A. IDEQ DMR Review

IDEQ conducted a DMR review from January 2007 through July 2015. The following is a summary of that review:

1. Water Right Flow.
The water rights for the facility are IDWR No. 37-07082 for 15.84 cfs from January 01 to December 31 for fish propagation. DMR data was available for review.

2. TSS & TP Concentration Data.
IDEQ determined that the TSS and TP concentration data appeared to be complete and accurate.

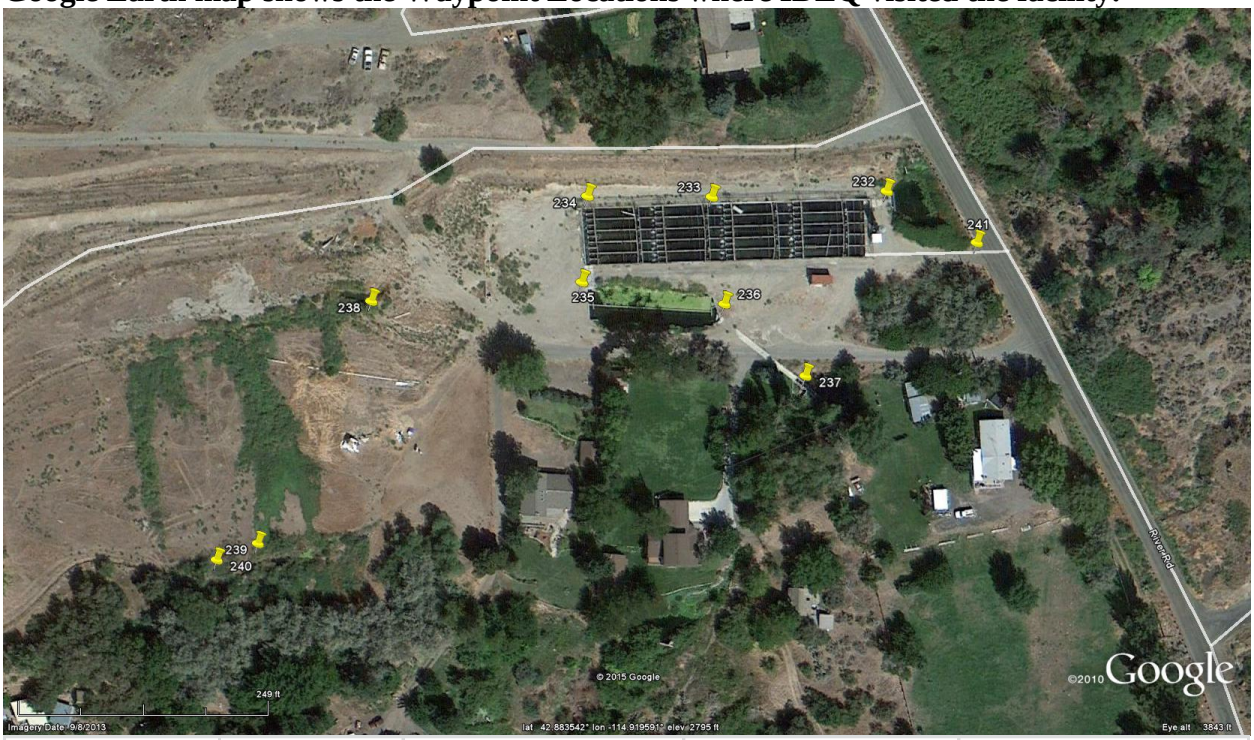
Permitted TSS and TP effluent levels for the facility is based on seasonal effluent limitations, see table below.

Table 3
Seasonal Effluent Limitations for Selected Facilities in the Upper Snake Rock Watershed

Facility Name	Permit Number	Season	Limitations (lbs/day)			
			Net TSS		Net Total Phosphorus	
			Average Monthly	Maximum Daily	Average Monthly	Maximum Daily
Smith Farm Ponds	IDG130090	Dec. - Feb.	454.2	863.1	7.8	11.5
		Mar. -- May	274.0	520.5	5.0	7.4
		Jun. - Aug.	274.0	520.5	5.0	7.4
		Sep. - Nov.	454.2	863.1	7.0	10.4

3. Lab Data to DMR's.
Laboratory results were submitted and available to IDEQ for review. The DMRs appear to correspond correctly with the Lab's analyses.

Exhibit B. Latitude/Longitude Waypoint Locations
Google Earth map shows the Waypoint Locations where IDEQ visited the facility.

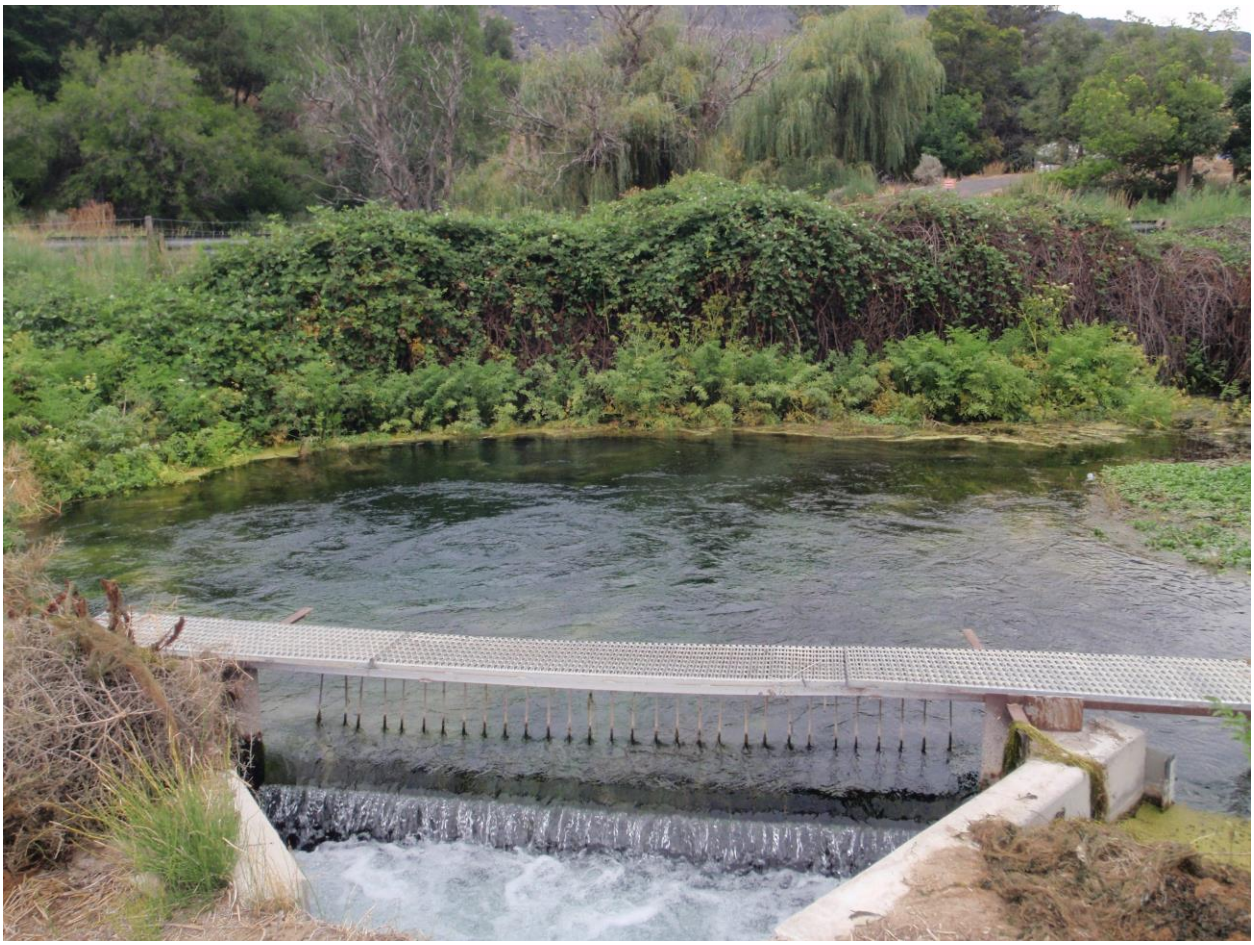


		Latitude	Longitude	Date/Time
WAYPOINT	232	42.88398569	-114.918686	8/3/2015 10:31
WAYPOINT	233	42.88396759	-114.9193088	8/3/2015 10:36
WAYPOINT	234	42.88397103	-114.9197476	8/3/2015 10:39
WAYPOINT	235	42.88375117	-114.9197697	8/3/2015 10:40
WAYPOINT	236	42.88369426	-114.9192587	8/3/2015 10:41
WAYPOINT	237	42.88350541	-114.918962	8/3/2015 10:42
WAYPOINT	238	42.8837013	-114.9205216	8/3/2015 10:45
WAYPOINT	239	42.88305195	-114.9209723	8/3/2015 10:48
WAYPOINT	240	42.88300702	-114.9211256	8/3/2015 10:49
WAYPOINT	241	42.88385469	-114.9183553	8/3/2015 10:54

Exhibit C. Digital photographs:
Name of Facility: FBI - Smith

Photographer: Craig Thomas

Inspection / Photographs taken Date: 08/03/2015

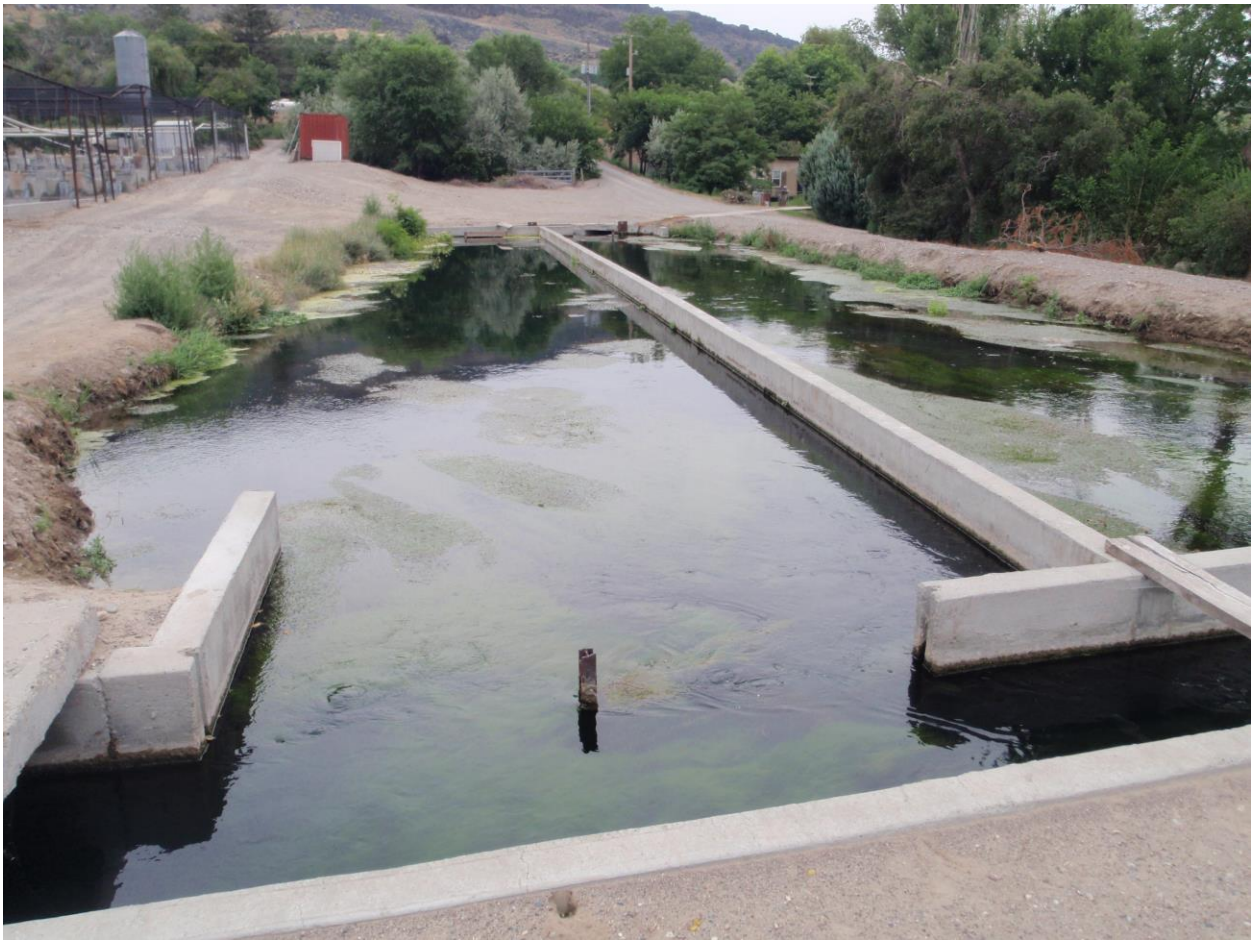


Waypoint 232 - Inflow Decker Spring and water flow measuring point, staff gage on picture lower right

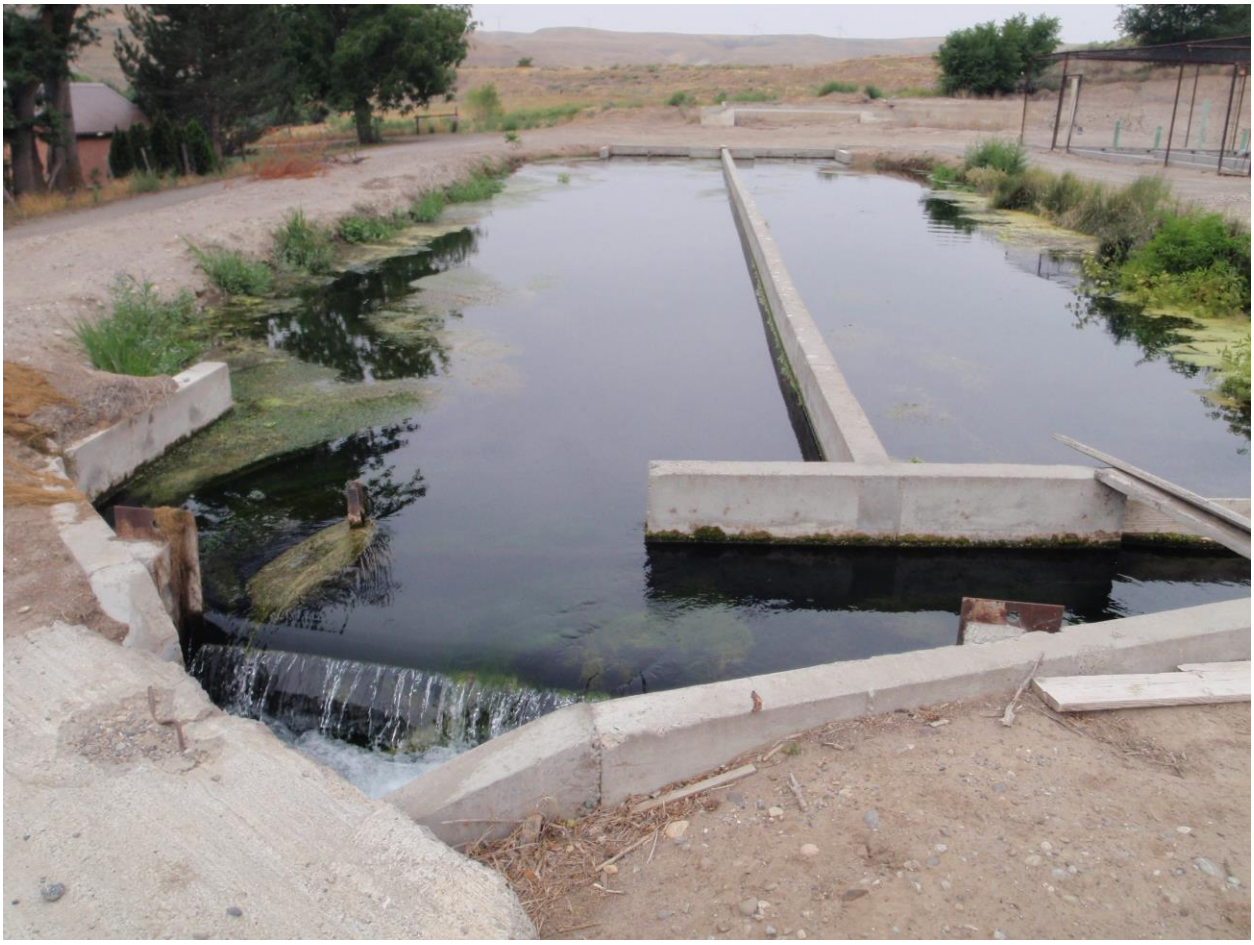
Waypoint 232 - Top of A-Raceways with D-Raceways in far back of photo

Waypoint 233 - Bottom of B-Raceways on left and top of C-Raceways on right

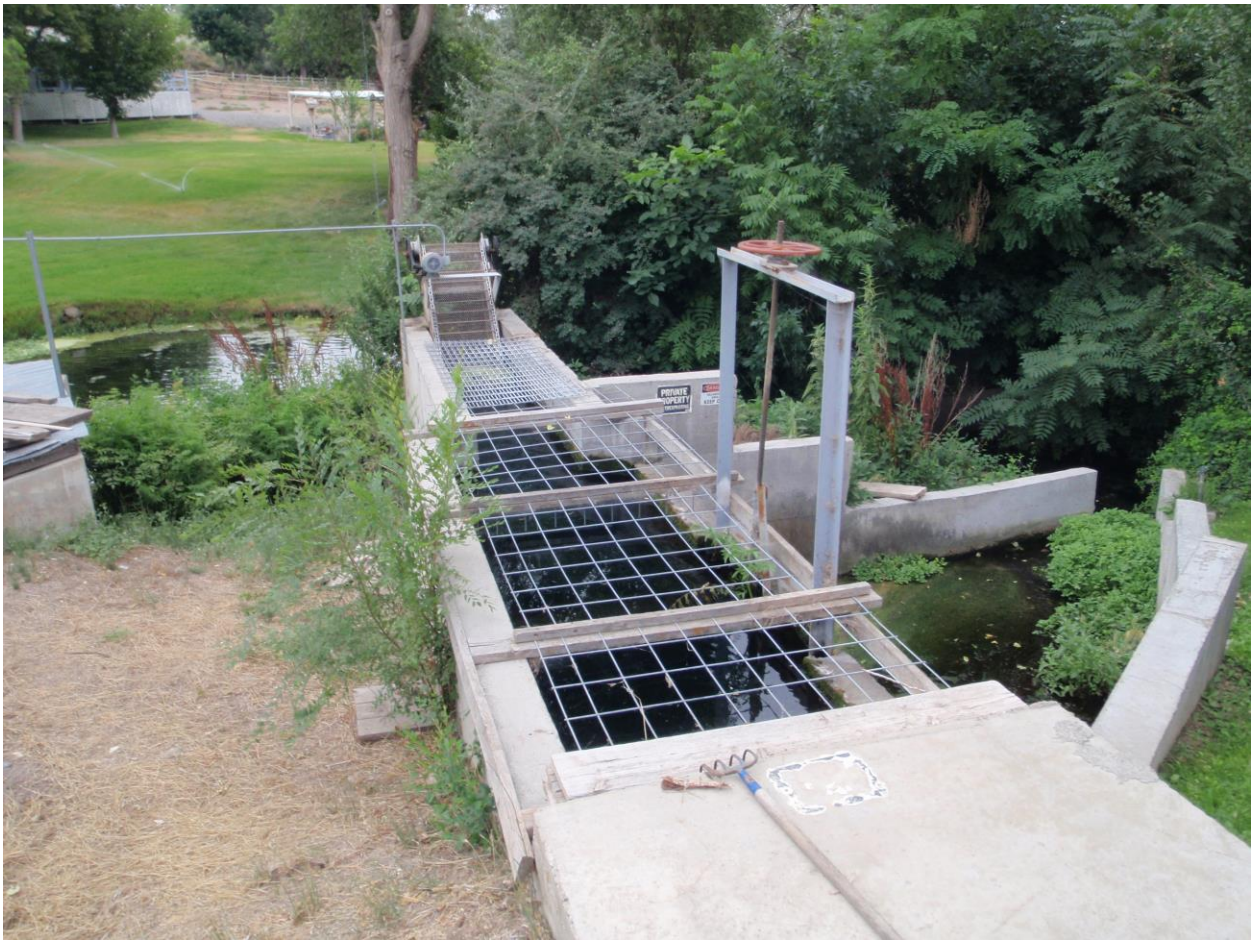
Waypoint 234 - Bottom of D-Raceways and tail ditch to FFSB



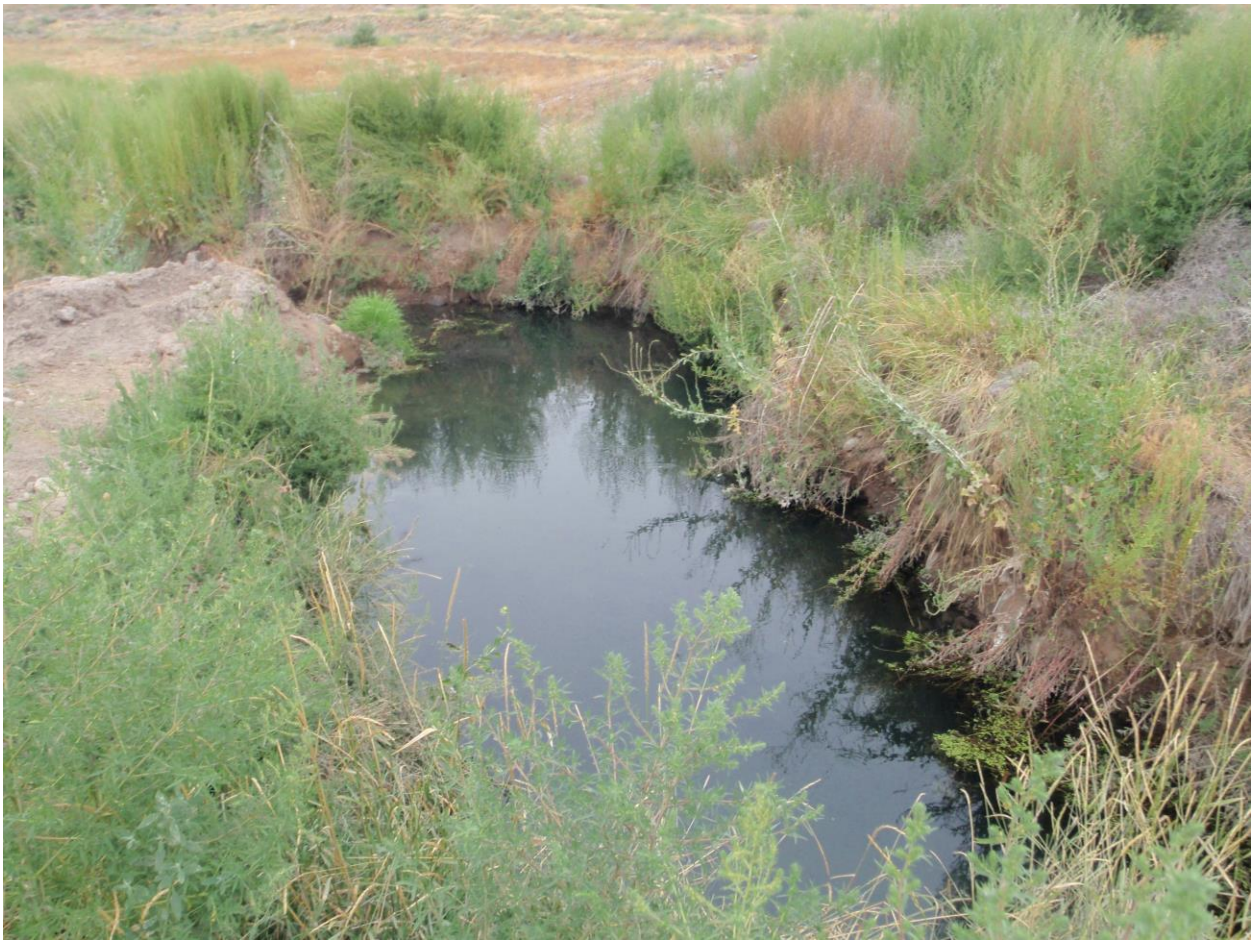
Waypoint 235 - Top of FFSB



Waypoint 236 - Bottom of FFSB and discharge effluent sampling point



Waypoint 237 - Discharge flume to hydro-plant off property, additional water quality sampling point



Waypoint 238 - Top dry cell for QZ cleaning water

Waypoint 239 - First lower dry cell for QZ cleaning water

Waypoint 240 - Second lower dry cell for QZ cleaning water

Waypoint 241 - Entrance to Big Bend Trout – Smith

Exhibit D: Water Quality Results

IDAHO DEPARTMENT OF HEALTH & WELFARE

Idaho Bureau of Laboratories
Christopher L. Ball, Ph.D, HCLD (ABB)
Laboratory Director
EPA Lab ID00018
CLIA Certified Lab

2220 Old Penitentiary Road
Boise, Idaho 83712
Phone: (208)334-2235
www.statelab.idaho.gov

August 21, 2015

Report To Engineering
Department of Environmental Quality - Twin Falls Office
650 Addison Ave W, Suite 110
Twin Falls, ID 83301

Sample Submitted By Department of Environmental Quality - Twin Falls

RE: Workorder E150800015 080415
Profile 8504-Twin Falls-Sewage Treatment

Enclosed are the analytical results for sample(s) received by the laboratory on Tuesday, August 4, 2015. Results reported herein conform to the most current federal standards, where applicable, unless otherwise narrated in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Ernie Bader

Ernie Bader

Enclosures

CERTIFICATE OF ANALYSIS

IDAHO DEPARTMENT OF HEALTH & WELFARE

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Boise, Idaho 83712
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Workorder: E150800015 080415

SAMPLE SUMMARY

Lab ID	Sample ID	Matrix	Date Collected	Date Received
[redacted]	[redacted]	Water	8/3/2015 13:40	8/4/2015 11:18
		Water	8/3/2015 14:35	8/4/2015 11:18
		Water	8/3/2015 14:50	8/4/2015 11:18
		Water	8/3/2015 13:19	8/4/2015 11:18
		Water	8/3/2015 13:25	8/4/2015 11:18
		Water	8/3/2015 12:07	8/4/2015 11:18
		Water	8/3/2015 12:45	8/4/2015 11:18
E150800015-008	IDG130090 - In	Water	8/3/2015 11:00	8/4/2015 11:18
E150800015-009	IDG130090 - Out	Water	8/3/2015 10:58	8/4/2015 11:18

CERTIFICATE OF ANALYSIS

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Workorder: E150800015 080415

ANALYTICAL RESULTS

Chemistry samples are disposed of after 60 days unless the laboratory is notified otherwise.

Lab ID: E150800015-008 Date Received: 8/4/2015 11:18 Matrix: Water
Sample IDG130090 - In Date Collected: 8/3/2015 11:00
Location: Smiths - In

-- General Chemistry --

Parameters	Results	Units	Detection Limit	Analyzed	By	Qual	MCL
Preparation Method: EPA 365.1							
Analytical Method: EPA 365.1							
Total Phosphorus	0.050	mg/L	0.0050	8/12/2015	SUR		
Preparation Method: SM 2540D							
Analytical Method: SM 2540D							
Total Suspended Solids	<5.0	mg/L	5.0	8/10/2015	SUR		

CERTIFICATE OF ANALYSIS

IDAHO DEPARTMENT OF HEALTH & WELFARE

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Boise, Idaho 83712
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Workorder: E150800015 080415

ANALYTICAL RESULTS

Chemistry samples are disposed of after 60 days unless the laboratory is notified otherwise.

Lab ID:	E150800015-009	Date Received:	8/4/2015 11:18	Matrix:	Water
Sample	IDG130090 - Out	Date Collected:	8/3/2015 10:58		
Location:	Smiths - Out				

-- General Chemistry --

Parameters	Results	Units	Detection Limit	Analyzed	By	Qual	MCL
Preparation Method: EPA 365.1							
Analytical Method: EPA 365.1							
Total Phosphorus	0.094	mg/L	0.0050	8/12/2015	SUR		
Preparation Method: SM 2540D							
Analytical Method: SM 2540D							
Total Suspended Solids	<5.0	mg/L	5.0	8/10/2015	SUR		

CERTIFICATE OF ANALYSIS

[END]

Aquaculture Facility Inspection Survey